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April 14, 2008

Via Certified U.S. Mail

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**Subject: United States of America, et al. vs. Reilly Tar and Chemical Corporation, et al.
 File No. Civ. 4-80-469; CD-RAP Section 7.4
 Prairie du Chien – Jordan aquifer Gradient Control Plan**

Gentlemen:

This letter provides a revised work plan for the Prairie du Chien – Jordan Aquifer. The original work plan was provided to the Minnesota Pollution Control Agency and the U.S. Environmental Protection Agency (the Agencies) on January 22, 2008. The City of St. Louis Park (City) met with the Agencies via conference call on March 27, 2008 to discuss the Agencies' concerns and comments. The Agencies requested that this work plan evaluate primarily the horizontal flow in the Prairie du Chien – Jordan Aquifer and not evaluate the vertical flow with overlying aquifers at this time. The horizontal evaluation does not include the temporary cessation of groundwater pumping in the shallower aquifers, as discussed in the January 22, 2008 work plan. Other elements of the January 22, 2008 remain unchanged, as summarized below.

Scope of Work and Schedule

The overall strategy for ensuring the integrity of the PCJ gradient control system consists of three steps:

1. Assess current conditions,
2. Monitor groundwater to determine plume location and movement, and
3. Provide additional pumping (e.g., at wells SLP6, W119, or W48) if needed.

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Table 1 presents a step by step summary of the work scope and schedule. Current conditions will be assessed with the aid of new data collection and groundwater modeling. The new data to be collected includes six months of continuous water level measurements in available PCJ wells (see Table 2). These water level measurements during pumping and static conditions will be analyzed to determine aquifer parameters for the groundwater model, and a better record of local groundwater flow directions.

The six months of water level data will be shared with the Agencies and will be used to map heads over time, calculate aquifer parameters, and update the model. The City understands that additional modeling may be done by the Agencies using the updated information to evaluate the effectiveness of PCJ gradient control on the Reilly plume. As such, it will be a collaborative effort to evaluate the existing conditions and determine the need for system modification. The City anticipates submitting a report (Task 5) that either describes a specific plan for gradient control modifications, or a description of current conditions that indicates modifications are not needed, within 60 days of the final modeling results.

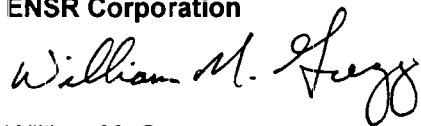
As indicated in Table 1, Task 6, the model may also be used to evaluate the potential need for additional PCJ monitoring well(s). If necessary, monitoring well locations that would provide an early warning of PAH migration to Edina will be assessed. The City will install one or more additional monitoring wells within 60 days of the Agencies' approval of the Task 5 report. If the groundwater monitoring data indicate a PAH problem for Edina, then the most immediate action would be to start pumping at well SLP6, with discharge to Minnehaha Creek. Further modifications could then be considered, such as, treating the SLP6 discharge, or pumping at W48 or W119.

Other than the wells identified in the 2008 Sampling Plan, no additional PCJ Aquifer monitoring wells are known to be available in appropriate locations for sampling to assist in this investigation. However, one potential well was identified on the County well index that may provide useful water quality and water level information. That well has Minnesota unique number 227132 and appears to be located in the vicinity of the Thermo-Tec facility in Hopkins. The City requests assistance from the agencies in determining if this is a viable PCJ Aquifer monitoring well.

The City is prepared to move ahead with this program at the schedule indicated in Table 1, and looks forward to working with the Agencies to resolve this issue prior to the next Reilly Site Five-Year Review. Please contact this office if you have any questions regarding this submittal.

Sincerely,

ENSR Corporation



William M. Gregg
Project Leader for the
City of St. Louis Park

Enclosures

cc: Scott Anderson, City of St. Louis Park

Table 1 Summary of Prairie du Chien - Jordan Aquifer Gradient Control Plan

Task	Task Description	Schedule	Task Lead	Projected Dates*
1	Equip PCJ wells with transducers	Within two months of Plan approval	City	14-Jul-08
2	Collect continuous water level data (Opportunities for PCJ aquifer tests)	For a duration of six months after pumping cessation	City	7/14/08 to 1/14/09
3	Utilize water level data to determine aquifer parameters, new model input, and PCJ impacts on shallower aquifers	One to two months after Task 2	City and Agencies	14-Feb-09
4	Conduct additional modeling runs and report	Two to four months after Task 2	Agencies	14-Mar-09
5	Assess modeling results and prepare recommendations for changing PCJ gradient control system, if needed	Within two months of the final modeling results	City	14-May-09
6	If modeling indicates that gradient control is not effective, design and install additional monitoring wells	Within two months of deciding to install wells (and Agencies' approval)	City	Summer 2009
7	If groundwater monitoring indicates a potential PAH problem in Edina, institute groundwater pumping at SLP6	Within one month. Other pumping scenarios could be considered, but SLP6 can be started up the quickest	City	Within one month of the receipt of the data

* Assumes Agencies approve this plan one month after its submittal (i.e., May 14, 2008).

Table 2
Candidate PCJ Wells for Water Level Transducers

Aquifer	Well ID*	Description	Priority Wells**
PCJ	SLP4	Municipal well	Yes
PCJ	SLP5	Municipal well	
PCJ	SLP6	Municipal well	Yes
PCJ	SLP7	Municipal well	
PCJ	SLP8	Municipal well	
PCJ	SLP10	Municipal well	
PCJ	SLP14	Municipal well	
PCJ	SLP15	Municipal well	Yes
PCJ	SLP16	Municipal well	
PCJ	E2	Municipal well	Yes
PCJ	E3	Municipal well	
PCJ	E4	Municipal well	
PCJ	E5	Municipal well	
PCJ	E6	Municipal well	
PCJ	E7	Municipal well	
PCJ	E8	Municipal well	
PCJ	E11	Municipal well	
PCJ	E13	Municipal well	Yes
PCJ	E14	Municipal well	
PCJ	E15	Municipal well	Yes
PCJ	E16	Municipal well	
PCJ	E17	Municipal well	
PCJ	E18	Municipal well	
PCJ	H1	Municipal well	
PCJ	H4	Municipal well	
PCJ	H5	Municipal well	
PCJ	H6	Municipal well	Yes
PCJ	MTKA6	Municipal well	Yes
PCJ	MTKA9	Municipal well	
PCJ	W23	Reilly well	Yes
PCJ	W29	Flame Industries	Yes
PCJ	W32	Texatanka Mall	
PCJ	W48	Methodist Hospital	Yes
PCJ	W119	Meadowbrook GC	
PCJ	W401	Interlachen CC	Yes
PCJ	W402	Reilly well	Yes
PCJ	W403	Reilly well	Yes
PCJ	W406	Minnekahda Club	Yes
PCJ	227132	Thermo-Tec??	Yes
PCJ	748656	STS/Edina Test Well	

Notes:

*Wells highlighted in **Bold** are currently equipped with transducers.

**Priority wells are considered to be in the best locations to provide water level data. The City will enlist Agency assistance to equip these wells with transducers - if necessary.

The remaining wells represent all PCJ wells identified in the study area.